

Appl. No. 9/864,593  
Amdt. Dated May 25, 2005  
Reply to Office action of March 1, 2005  
Attorney Docket No. P13558-US1  
EUS/J/P/05-3123

### **REMARKS/ARGUMENTS**

#### **Claim Amendments**

The Applicant has not amended the claims. Applicant respectfully submits no new matter has been added. Accordingly, claims 8-14 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

#### **Claim Rejections – 35 U.S.C. § 103 (a)**

Claims 8-14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ylonen et al. (US 6,438,612 B1 hereinafter Ylonen) and further in view of Moles, et al. (US 6,725,056 B1 hereinafter Moles). The Applicant respectfully traverses the rejection of these claims.

The Applicant's invention discloses a device and method for facilitating the management of IP packets that are associated with a Security Association. There are three components including an IP forwarder for determining the destination of the packets, a plurality of security procedure modules for receiving the IP packets and a security controller for allocating negotiated SAs among the modules. The SC also notifies the security procedure modules and the IP forwarder of the allocation.

The Ylonen reference appears to disclose a method for identifying virtual networks and virtual routers during secure tunneling through a network. A separate security association is used to send packets to each virtual router at a physical computing device identified by the network address. A negotiation takes place between two virtual routers in the network and a security association is established that identifies the transmitting and receiving virtual routers. Essentially Ylonen is including virtual addresses in the security association for ease of routing data packets between virtual routers.

The Moles reference appears to disclose a provisioning system in a wireless network. The system prevents any un-provisioned mobile station from accessing the wireless network and accessing the Internet via a data call to a base station. A

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controller is utilized to transmit provisioning retrieved from a provisioning server associated with an associated IP data network. (Abstract)

The Applicant's invention discloses a device and method for processing IPsec data packets at an intermediate networking device, in this case a router. The basic concept is to provide a mechanism for handling multiple security associations (SAs) in parallel without extensive modifications. A security controller (SC) module is disclosed for distributing IPsec policies to a plurality of Security Process (SecProc) modules. When new SAs are created the SC determines the SecProc modules for placing the new SAs. And the SC module installs IP filters into IP forwarder (IPFW) modules.

The IPFW modules determine where each packet is sent inside the system through filters installed in the IPFW by the SC. The filters match "selectors" in the packets according to the IPsec policy that is deployed. The filter points to the security processor that handles the IPsec processing for a packet (Page 5, first and second paragraph).

The Ylonen reference was cited for teaching 1) at least one IP forwarder, 2) a plurality of security procedure modules and 3) a security controller; all three features claimed in claim 8. For example, Applicant's claim 8 combination recites the use of a security controller to allocate negotiated SAs among security procedure modules. The plurality of security modules is coupled to at least one IP forwarder that receives IP packets and determines and forwards a packet to the IP packet destination. These elements are neither taught nor suggested by the Ylonen reference.

In the Official Action, a correspondence is drawn between these claimed features and the description in the Ylonen reference of 1) negotiation between a transmitting and a receiving device; 2) an individual IPsec processor for each virtual router and an alternative embodiment that disclosed a plurality of IPsec processors for one virtual router and 3) functions that are performed by an automatic key manager and an IPsec block that communicates with a security policy database. The Applicant respectfully asserts that the above features drawn from the Ylonen reference do not disclose the features claimed in Applicant's claim 8.

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The Moles reference is cited for disclosing a security controller that, among other functions provides storage space for incoming IP packet data field and outgoing IP packet data field. However, Applicant has reviewed this cited portion of Moles and finds no reference to a security controller, as in the Applicant's invention, that allocates negotiated SAs among Security procedure modules and notifies both the IPFWs and the security procedure modules.

It is respectfully submitted that Moles does not address the above-identified deficiencies of Ylonen with respect to Applicant's invention. The combination of the Ylonen and Moles references fails to teach utilizing a security controller that allocates negotiated SAs among a plurality of security procedure modules and notifies the security procedure modules and the IPFWs involved of the allocation. Nor does the combination disclose the at least one IPFW nor the plurality of security procedure modules.

The Applicant respectfully asserts that claim 8 contains limitations not found in either Ylonen or Moles. Claim 14 is analogous to claim 8 and contains similar limitations. Claims 9-13 depend from claim 8 and contain the same novel limitations found in claim 8. The Applicant respectfully requests the withdrawal of the rejection of these claims.

#### **Prior Art Not Relied Upon**

In paragraph 3 on page 5 of the Office Action, the Examiner stated that the prior art made of record and not relied upon is considered pertinent to the Applicant's disclosure.

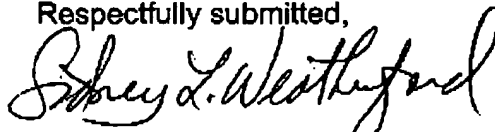
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### CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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